

EXHIBIT B

**CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER
NAN "ANNIE" SUO - June 8, 2022**

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

OPULENT TREASURES, INC.,

Plaintiff,

vs.

YA YA CREATIONS, INC.,

Defendants.

CIVIL ACTION NO.

2:21-cv-00313-JRG

REMOTE DEPOSITION OF NAN "ANNIE" SUO

WEDNESDAY, JUNE 8, 2022, 10:05 A.M.

(THIS TRANSCRIPT IS DESIGNATED AS CONFIDENTIAL PURSUANT
TO THE PROTECTIVE ORDER)

Reported remotely by Harry Alan Palter, California
CSR No. 7708, a Certified Stenographic Reporter

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1 guess, if you didn't have a title, what was your job
2 when you first started at Ya Ya Creations?

3 A Also customer service rep.

4 Q How many other customer service reps were there
5 at Ya Ya Creations when you started?

6 A That was ten years ago. I would say four or
7 five.

8 Q And how many -- approximately, how many
9 employees were there at Ya Ya Creations when you
10 started?

11 A I couldn't give you the exact number.

12 Are you -- you mean, that's including the
13 warehouse workers?

14 Is that including everybody on the payroll
15 or --

16 Q Everybody on the payroll. It could just be
17 approximate. Doesn't have to be exact.

18 A I would say 20 to 30.

19 Q And at some point, did you move out of the
20 customer relations department?

21 A Yes. I transferred.

22 Q Okay. And when -- when did you transfer?

23 A I became a buyer of Ya Ya Creations in 2015.

24 Q What did you do as a buyer for Ya Ya Creations?

25 A It's more like merchandising. Picking up

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1 product for the website, what to import, what we want to
2 sell.

3 Q Did anybody help you with those job tasks?

4 A Can you be more particular on helping? Like,
5 do you mean there's -- I'm not sure --

6 Q Did you -- I'm sorry. We're talking over each
7 other, and that was my fault. I apologize.

8 Were you working under anybody -- did you
9 have -- strike that.

10 Did you have a supervisor when you first
11 started as a buyer for Ya Ya Creations?

12 A No.

13 Q Were you the only person who was a buyer for
14 Ya Ya Creations in 2015?

15 A Yes.

16 Q Was there anybody that you reported to at Ya Ya
17 Creations when you started as a buyer in 2015?

18 A Yes. In 2015, I reported to the CEO, which is
19 Mitch Su.

20 Q And was there anybody who was above Mr. Su at
21 Ya Ya Creations?

22 A No.

23 Q And did you say he was the COO or the CEO?

24 A CEO.

25 Q Did Mr. Su have any input into buying

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1 merchandise for Ya Ya Creations?

2 A Is it -- you mean, during that year or --

3 Q Yeah. It looks -- we'll start with 2015 when
4 you started. Correct.

5 A When I first started, he has some of the input,
6 because I was doing training. And now, after six
7 months, I kind of -- I kind of just handle the entire
8 style picking/purchasing by myself.

9 Q Was Mr. Su the buyer for Ya Ya Creations before
10 you started in that position in 2015?

11 A Yes.

12 Q And I think we established -- so 2015, you were
13 the only person who was acting as a buyer for Ya Ya
14 Creations; is that accurate?

15 MR. KARISH: Objection. Misstates the prior
16 testimony.

17 MR. DALTON: Okay.

18 BY MR. DALTON:

19 Q What was your answer?

20 A (No response).

21 Q Oh, Ms. Suo, at some point, sometimes
22 Mr. Karish might interject certain objections. He's
23 just doing that to preserve certain objections at trial.

24 Unless he tells you not to answer a question,
25 you're obligated to answer my question as it was posed

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1 you exact answer on that.

2 Q Do you think other people at Ya Ya Creations
3 might have been acting as a buyer for Ya Ya at that same
4 time?

5 A In my point of view, not really.

6 Q Who do you think might have been helping as a
7 buyer for Ya Ya Creations in 2015?

8 A It would have been Mitch.

9 Q Anybody else?

10 A No. Not -- not I'm aware of.

11 Q After 2015, were there other people who acted
12 as buyers for Ya Ya Creations?

13 A It would be Mitch Su.

14 Q How long did you -- are you still a buyer for
15 Ya Ya Creations?

16 A Yes.

17 Q So you've held that job from 2015 to the
18 present day; correct?

19 A Yes.

20 Q And during -- from 2015 to the present day, the
21 only person that you recall who might have helped you as
22 a buyer is Mitchell Su; correct?

23 A Correct.

24 Q Do you know what Mr. Su does in his capacity as
25 a buyer for Ya Ya Creations?

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1 CERTIFIED SHORTHAND REPORTER'S CERTIFICATE

2

3 I, Harry A. Palter, CSR No. 7708, Certified
4 Shorthand Reporter for the State of California, do
5 hereby certify: That prior to being examined, the
6 witness in the foregoing deposition, Nan "Annie" Suo,
7 was duly sworn to testify the truth, the whole truth,
8 and nothing but the truth; that said deposition was
9 taken down by me stenographically and remotely in a
10 readable format at the time and place therein named; and
11 that the same is a true, correct, and complete
12 transcript of said deposition.

13 Before completion of the deposition, review
14 of the transcript [] was [X] was not requested. If
15 requested, any changes made by the deponent (and
16 provided to the reporter) during the period allowed, are
17 appended hereto.

18 I further certify that I am not interested in
19 the outcome of the action. In witness whereof, I have
20 hereunto subscribed my name.

21 Dated: 14th day of June, 2022

22

23

24



25 HARRY ALAN PALTER, CSR No. 7708